

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE *et al.*,

Plaintiffs,

v.

MAST *et al.*,

Defendants.

Civil Action No. 3:22-cv-49

FEDERAL DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26(c), nominal Defendants the United States Secretary of State Antony Blinken and United States Secretary of Defense General Lloyd Austin (“Nominal Defendants”) respectfully move the Court for entry of a protective order forbidding the discovery sought by defendant Richard Mast’s First Set of Requests for Production (“RFPs”) to Nominal Defendants, served pursuant to Fed. R. Civ. P. 34. The grounds for this Motion are set forth in the accompanying Memorandum in Support of Nominal Defendants’ Motion. Nominal Defendants, through undersigned counsel, certify that Nominal Defendants have in good faith conferred with Richard Mast, through counsel, in an effort to resolve this dispute without court action but were unable to reach a resolution.

April 17, 2023

Respectfully submitted,

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